

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)
et al.,)
)
) Plaintiffs,)
)
V.) Case No. 5:21-cv-844 (XR)
) (Consolidated Cases)
STATE OF TEXAS, et al.,)
)
) Defendants.)

ORAL DEPOSITION OF:

CHRISTINA ADKINS

April 11, 2023

Oral deposition of CHRISTINA ADKINS, produced as a witness at the instance of the plaintiffs, and duly sworn, was taken in the above-styled and numbered cause on the 11th day of April, 2023, before Patrick Stephens, Certified Court Reporter, at 209 W. 14th Street, Austin, Texas 78701.

1 A My response would have been to tell the voter to put
2 -- if they want to put both IDs, if they're -- or both numbers
3 and they're are doing that, to go ahead and put both numbers.

4 Q Okay. You can set that aside. So during your last
5 deposition, we briefly discussed some counties using inserts --
6 or including inserts that explained the ID requirement under SB1
7 when they mail out mail-voting materials -- and when I say
8 mail-voting materials, I'm including both the ABBM as well as
9 the carrier envelope -- and you testified that your office has
10 approved inserts that recommended putting both ID numbers down
11 on their ABBM or carrier envelope. Do you recall that?

12 A I do.

13 Q As far as you know, did the counties continue to use
14 similar inserts during the November 2022 general election?

15 A To my knowledge, yes.

16 Q Leading up to the November 2022 election, did your
17 office encourage counties to include an insert about the ID
18 requirement?

19 A I don't know -- I don't remember if I -- well, I don't
20 know if I would use the term encourage, but we did communicate
21 with counties that that was definitely an option that the -- I
22 mean, if they wanted to add an additional insert like that, they
23 were more than welcome to do that.

24 Q All right. So your office did not require them to
25 include the inserts, but said that that -- offered that as an

1 option. Is that -- is that fair?

2 A That's correct, because, you know, the balloting
3 materials that you send to the voter, again, that's dictated by
4 law, what information has to be provided, and so as far as
5 requiring it, that's probably a bridge too far with what our
6 office can do.

7 Q But your office can offer -- say -- or tell the
8 counties about what some of the best practices may be; is that
9 right?

10 A That's correct. We can communicate best practices, we
11 can, you know, direct people to other counties that may be, you
12 know, doing something specific in their county that could be
13 helpful to replicate.

14 Q Okay. Do you believe that including these inserts is
15 a good practice?

16 A I think that from what I've heard, the counties that
17 did it, it was very successful. Or -- or let me rephrase that.
18 I think I didn't hear any problems with it.

19 Q Okay.

20 A I didn't hear anybody objecting to it, so I just --
21 you know, I would think that it was helpful.

22 Q Or did you also hear from counties that they were glad
23 they did it or that it was helpful for them?

24 A That's hard to measure. It's hard to know if -- if
25 that insert -- that form made the difference in somebody putting

1 voters, and I think if we're too prescriptive on telling them
2 how to find a voter record it might eliminate their ability to
3 access records. So I don't think we want to be that
4 prescriptive. We want them -- we want them to cast to a wide
5 net in pulling voter records.

6 Q Okay.

7 A That said, I will clarify that when it comes to
8 finding personal identification numbers, we do tell our counties
9 that the numbers that's in TEAM is the number that matters, and
10 that's what controls. And so if -- if a county has an off-line
11 vendor and they don't have all of the information that TEAM has,
12 they need to check TEAM. So we are prescriptive in that sense
13 because that's, again, going to be more beneficial to the voter.

14 Q Okay. Understood. And so we spoke about trainings in
15 general that your office ran for county election officials
16 leading up to the -- or leading up to July of last year when we
17 spoke last time. Did any -- did more of those take place
18 between July and November of last year?

19 A Absolutely.

20 Q Do you believe that additional trainings of county
21 officials and state officials -- for example, your employees --
22 helped to reduce ballot rejection rates between the March
23 primary and the November general election?

24 A I think it's possible because we, you know, want to
25 reinforce the information as much as we can. There's turnover

1 in the election community at times, and so we want to make sure
2 that all individuals that are working a given election have as
3 much information in front of them as possible. That's why we
4 try to offer pretty rigorous training before each election.

5 Q And you said it's possible as opposed to yes.

6 A I have no way of knowing what actually impacts
7 rejection rates or that -- that information. I mean, that's
8 data that you can't really ascertain on our end.

9 Q Okay.

10 A We don't know what's going to make the difference
11 there, if it's the training we offer, if it's insert to a form,
12 if it's, you know, communication efforts by county election
13 officials. I -- I don't know what results in that rejection
14 rate. All I know is that we're going to do -- we do everything
15 that we can, which is -- the one thing we can definitely do is
16 to offer more training opportunities than they know what to do
17 with, and so we do what we can on our part. I -- I don't know
18 what actually results in the change, though.

19 Q Right. Understood. Are you aware of any ballot
20 rejections from the general election that resulted from
21 misapplication of SB1 by county officials?

22 A No. I'm not aware of any specific instances.

23 Q Do you expect any further reductions in mail-ballot
24 rejections based on trainings that your office offers in the
25 future?